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March 15, 2016

Office of Air, Waste & Toxics

Ms. Jan Palumbo (AWT-150)
United States EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Subject: February 2016 Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the February 2016 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from February 15, 2016, to March 14, 2016.

SIGNIFICANT DEVELOPMENTS THIS PERIOD

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Results from the groundwater monitoring from the week of December 8, 2015 were received in late January and the data was validated in early February. The Second Half 2015 Pilot Study O&M Report will be submitted March. Results were included in the previous progress report.
- In August and early September, the CMS was revised (Version 4) to incorporate the results of the oxidation bench scale study and incorporate EPA comments. EPA informed the Baxter team that Battelle had been contracted to review the data from the site and provide corrective measure recommendations to EPA. EPA requested that the Baxter team place the CMS on hold until the Battelle report is completed and EPA and Baxter teams have met to discuss the ramifications of the Battelle recommendations. No work was conducted on the CMS this month pending direction from EPA.
- The recirculation trench continues to operate. The pumping rates at EW-2 and EW-4 were increased during the first quarter sampling event at the end of February. EW-01, EW-02, EW-04, and EW-05 are recirculating groundwater at a total flowrate of approximately 42-45 gpm. Since rehabilitating the trench, no shutdowns have occurred due to high water levels in the infiltration trench.

1700 El Camino Real, Suite 365

P.O. Box 5902

San Mateo, CA 94402

Phone 650 349 0201 Fax 650 570 6878



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- The oxygen tanks in the iSOC wells were checked and those the two canisters that were near empty were replaced at the end of February. The remaining canister will be replaced in March.
- The Second Half 2015 Pilot Study O&M report is under preparation and will be delivered to EPA in March 2016.
- First Quarter groundwater sampling was conducted on February 27-29.

ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- EPA will provide the Baxter team with the Battelle report and set up a technical meeting to discuss the path forward.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- First Quarter 2016 groundwater sampling was conducted the end of February. Results are pending.

CERTIFICATION

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter

Title: Chief Executive Officer

1700 El Camino Real, Suite 365

P.O. Box 5902

San Mateo, CA 94402

Phone 650 349 0201

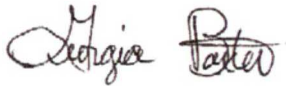
Fax 650 570 6878



Date: March 15, 2016

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter
Chief Executive Officer

cc: Jeanne Tran, Ecology
Jamie Hillery, Stella-Jones Corp.
RueAnn Thomas, Nattura Group

